From: Housing.Counseling

Sent: Wednesday, February 01, 2012 1:13 PM **To:** 'SF-Housing-Counseling-L@hudlist.hud.gov'

Subject: HUD-SSN Data Submission in Agencies' CMS

Housing Counseling Agencies,

As each agency implements their chosen Client Management System (CMS) to collect and transmit HUD required data electronically to HUD's Housing Counseling System (HCS), there have been some concerns about counselors providing Social Security Numbers (SSN).

We included the requirement to collect counselor SSN via CMS in anticipation of individual counselor certification as required by the Dodd-Frank Act. [Current HUD HECM Counselor Roster counselors are familiar with this requirement as a condition for Roster placement. They currently input their SSNs into FHA Connection, where the Roster is maintained.]

Per guidance from HUD, CMSs have built a general SSN requirement in their applications. So for most CMSs, successful transmissions of data to HUD are contingent on a complete response to the SSN request.

However, with the exception of the HUD HECM Counselor Roster, counselor certification is not yet being implemented by HUD, so collection of full social security numbers of counselors as part of CMS transmission is not yet necessary.

To allow the CMS data to successfully transmit into HCS, we will allow agencies provide partial SSNs to satisfy the CMS requirement, while hiding the counselor's complete SSN. Agencies may input the number "1" for the first 4 digits of their counselors' SSNs and input their actual SSNs for the last 5 digits. This information will be protected.

When the time comes when HUD may implement individual counselor certification, it may be necessary to require complete SSNs. In that event, HUD will notify agencies regarding updates to their SSN information.

Thank you for your cooperation.

This message has gone out to the email addresses provided by all active Counseling agencies in HUD's Housing Counseling Program. Nevertheless, all Parent Agencies should make sure their sub-agencies have received this information. Please direct questions or comments to your respective HUD point of contact or email Housing. Counseling@hud.gov by directly responding to this email addresses.

Sincerely,

Ruth Román Director, Program Support Division Office of Single Family Housing Department of Housing and Urban Development